

ORIGINAL

Clint Odom
Director
Federal Regulatory

EX PARTE OR LATE FILED



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2535
Fax 202 336-7922
clint.e.odom@verizon.com

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 20, 2002

Ex Parte

Marlene Dortch
Secretary
Federal Communications Commission
445 12th H Street, SW, Portals
Washington, DC 20554

RE: Application by Verizon New Jersey for Authorization To Provide In-Region, InterLATA Services in State of New Jersey, Docket No. 02-67 - REDACTED

Dear Ms. Dortch:

This letter responds to MetTel's Ex Parte dated June 10, 2002 and further to MetTel's Ex Parte date June 7, 2002 concerning Verizon's OSS. Again, MetTel has included new data submitted in this proceeding for the first time. As we have previously explained, the submission of new data at this late stage in the proceeding is inappropriate. See Public Notice (Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act), DA 01-734 (March 23, 2001) at 8.

In its June 10 Ex Parte, MetTel claimed that, since March it has been unable to parse its BOS BDT bills from Verizon, so that "at the present time there is no way for MetTel to confirm the services it is purchasing." MetTel June 10 Ex Parte at 6. In reality, MetTel has three "summary bill master" (SBM) accounts that are billed in the BOS BDT format – one "loop" SBM and two platform SBMs (one residence and one business). Until February, MetTel's "loop" BDT carried a platform designation ("J") and therefore was readable by MetTel. In February, as part of an effort to ensure synchronization of the bill type designation with the products and services appearing on bills, Verizon implemented certain system edits or checks. At that time, the designation on MetTel's "loop" BDT was changed to the loop designation ("N"), which caused MetTel's systems (which were set to read "J" type bills) to be unable to read the bill for this account. The BOS BDTs for MetTel's two platform accounts are correctly designated and were readable by MetTel. (All three BDTs are sent to MetTel on a single CD each month.) The amount of charges appearing on the "loop" BDT for MetTel for the three month period from March through May 2002 was less than *****, less than two-tenths of one percent of MetTel's current charges of over ***** on its three BDT accounts for these three months.

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REDACTED – FOR PUBLIC INSPECTION

Verizon has now corrected MetTel's "loop" BDT account, and MetTel should see this on its June bill.

In its June 10 Ex Parte, MetTel also claims that approximately ***** calls in New Jersey were incorrectly routed to a carrier other than the one MetTel requested on PIC change orders during the months of January through March 2002. MetTel June 10 Ex Parte, Exhibit A (bottom chart). These calls were part of over ***** New Jersey calls presented to Verizon on a CD (the CD also included calls from New York and Pennsylvania – in total, more than 1 million calls). In order to investigate the calls MetTel claimed were routed to the incorrect carrier, Verizon had to determine the telephone number from which the calls were made. Verizon determined that the calls on the CD were made from approximately ***** telephone numbers. The calls challenged by MetTel were made from ***** telephone numbers. In its investigation, Verizon determined that calls for ***** of the telephone numbers that were identified by MetTel for this three month period were routed to the incorrect PIC (approximately 9 percent of the instances MetTel presented to Verizon – not 25 percent as MetTel claims – and just 1 percent of the average number of lines [approximately *****] MetTel had in service over these three months).¹

As noted in our letter dated June 11, 2002, Verizon met with MetTel on June 11 to discuss MetTel's PIC change claims. Verizon is still working to understand how MetTel conducted its analysis in order to investigate the errors further. Verizon is also working with MetTel on a process to correct the errors found and update its records. Finally, Verizon is working with MetTel to develop a process for reporting any errors MetTel may believe it has found in the future so that they can be investigated and, if necessary, corrected more expeditiously.

In its June 7, 2002 Ex Parte, MetTel presented new data concerning usage and line loss reports. Verizon's preliminary investigation of that data shows that in approximately one-fifth of the cases cited by MetTel, the end user had not left MetTel but instead had been migrated by MetTel from resale to UNE platform. While MetTel should not have received a line loss report in these cases, MetTel's continued receipt of usage on the line was clearly appropriate.² In approximately 60 percent of the cases, the order activity disconnecting the end user from MetTel occurred after 6:30 p.m. when the batch process that updates the Toll guide began to run. The Toll guide was updated at the end of the next business day, but until the update, continued to guide usage to MetTel. This situation occurs for Verizon when retail customers migrate to CLECs as well. Verizon is investigating the appropriate solution. Verizon has insufficient data at present to determine the cause of the remaining ten percent of cases.

¹ For ***** other telephone numbers, Verizon did not have enough data to make a determination. Even if these are assumed to be errors, the percentage of numbers which had an erroneous PIC is only 13. As MetTel notes, June 10 Ex Parte at 3, Verizon had previously analyzed a sample of 20 telephone numbers from the CD that were hand-picked by MetTel (nine were New Jersey numbers and were a subset of the ***** discussed above, ten were New York numbers and one was a Pennsylvania number).

² Verizon is investigating the cause of the incorrect line loss reports.

Ms. Dortch
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On June 13 and June 18, MetTel filed additional ex partes stating its disagreement with previously filed Verizon ex partes and re-raising many of the issues it had raised in earlier comments and ex partes. As Verizon has previously explained, we have spent thousands of hours investigating and analyzing both MetTel's data and Verizon's own data in order to understand and address the issues MetTel has raised. In addition, Verizon has met and is continuing to meet with MetTel to review and reconcile data. This process has revealed flaws in MetTel's methodology and underlying assumptions on numerous issues. To the extent this process also has revealed circumstances where errors have occurred in Verizon's own processes, as described above, Verizon is determining how to improve its processes both for CLECs and for retail customers. In no respect, however, does this demonstrate that Verizon has failed to provide non-discriminatory access to its OSS. Rather, it is part of the process of identifying and addressing issues that arise in the ongoing business-to-business relationship with our wholesale customers.

This ex parte contains proprietary information and is subject to confidential treatment. A redacted version is also being filed. The twenty-page limit does not apply as set forth in DA 02-718. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Clint E. Allen".

cc: A. Johns
S. Pie